

*Nicoletti Hornig & Sweeney*

WALL STREET PLAZA  
88 PINE STREET  
SEVENTH FLOOR  
NEW YORK, NY 10005-1801  
TELEPHONE 212-220-3830  
FACSIMILE 212-220-3780  
GENERAL@NICOLETTIHORNIG.COM  
WWW.NICOLETTIHORNIG.COM

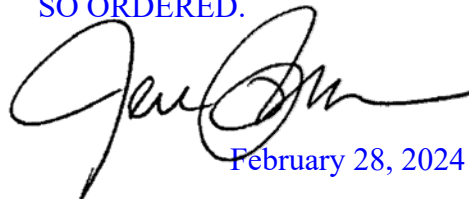
February 28, 2024

**VIA ECF**

Honorable Jesse M. Furman  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Application GRANTED. The initial pretrial conference scheduled for March 5, 2024, is hereby ADJOURNED to **April 16, 2024**, at **9:00 a.m.** The Clerk of Court is directed to terminate ECF No. 15.

SO ORDERED.



February 28, 2024

**RE: *Liberty Mutual Ins. Co. v. Kuehne + Nagel Inc.***  
**Case No. 23-cv-10511**

Dear Judge Furman:

We represent the plaintiff in the above referenced action. We write jointly with counsel for defendant Kuehne + Nagel Inc. d/b/a Blue Anchor America Line ("K+N") to respectfully request a 30-day adjournment of the initial scheduling conference currently scheduled for March 5, 2024.

The reason for the requested adjournment is that defendant K+N recently filed a Third-Party Complaint against Hapag-Lloyd Aktiengesellschaft ("Hapag") on February 20, 2022 [ECF Doc. No. 12] pursuant to Fed. R. Civ. P. 14(c). The additional time is needed in order to effect service of the Third-Party Complaint and provide Hapag with an opportunity to participate in this action.

This is the first request for an adjournment of the initial scheduling conference in this matter. The parties previously requested an extension of time for K+N to answer the complaint, which was granted.

We thank the Court for its time and consideration of this matter. Please do not hesitate to contact the undersigned with any questions or comments.

Respectfully submitted,

NICOLETTI HORNIG & SWEENEY

By:

A handwritten signature in black ink, appearing to be 'Val Wamser', with a long horizontal stroke extending to the right.

Val Wamser

**CC:**

**All Counsel of Record via ECF**